

SWIDLER BERLIN SHEREFF FRIEDMAN

3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7543

NEW YORK OFFICE
405 LEXINGTON AVENUE
NEW YORK, NY 10174

May 24, 2000

VIA OVERNIGHT DELIVERY

K. David Waddell, Executive Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37219

Re: Docket 99-00924
WorkNet Communications Inc.'s Application for a Certificate to Provide
Facilities-Based Local Exchange and Interexchange Telecommunications Services

Dear Mr. Waddell:

Enclosed for filing on behalf of WorkNet Communications Inc. ("WorkNet") is an original and thirteen (13) copies of WorkNet's response to the Tennessee Regulatory Authority's data request.

One extra copy of WorkNet's response is also enclosed. Please date stamp and return the enclosed copy of this filing and return it in the self-addressed, postage prepaid envelope provided. Should any questions arise concerning this filing, please do not hesitate to contact us.

Respectfully submitted,



Douglas D. Orvis II

Counsel to WorkNet Communications Inc.

Enclosures

cc: Patsy Fulton (TRA)
Mark Reams (WorkNet)
Gregg Strumberger

DOCKET 99-00924
WORKNET COMMUNICATIONS INC.
RESPONSE TO STAFF DATA REQUEST

Numbering Issues

Please provide answers to the following questions concerning numbering within your proposed service area.

- 1. What is your company's expected demand for NXXs per NPA within a year of approval of your application?**

WorkNet Communications Inc. ("WorkNet") anticipates requesting 2 NXXs during its first year of operations in Tennessee.

- 2. How many NXXs do you estimate that you will request from NANPA when you establish your service footprint?**

WorkNet Communications Inc. ("WorkNet") anticipates requesting 2 NXXs during its first year of operations in Tennessee.

- 3. When and in what NPA do you expect to establish your service footprint?**

WorkNet anticipates establishing its service footprint in the 615 and 901 areas shortly after gaining certification in Tennessee.

- 4. Will the company sequentially assign telephone numbers within NXXs?**

Yes, WorkNet will assign numbers within an NXX in sequential order.

- 5. What measures does the company intend to take to conserve Tennessee numbering resources?**

WorkNet will conserve Tennessee numbering resources by reusing numbers once they are discarded. WorkNet will utilize a 90-day grace period before reusing numbers. In addition, WorkNet will conserve numbering resources by monitoring actual use and remove reservations when numbers are not used in a timely manner.

- 6. When ordering new NXXs for growth, what percentage fill of an existing NXX does the company use to determine when a request for a new NXX will be initiated?**

WorkNet will order new NXXs based on a 75% utilization formula.

Tennessee Specific Operational Issues

Please provide answers to the following questions concerning Tennessee Specific Operational Issues.

- 1. How does the company intend to comply with TCA §65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee.**

Initially, WorkNet will set up all calling databases to mirror those of BellSouth.

- 2. Is the company aware of the Tennessee County Wide Calling database maintained by BellSouth and the procedures to enter your telephone numbers on the database?**

Yes, WorkNet is aware of the Tennessee County Wide Calling database maintained by BellSouth and the procedures to enter telephone numbers on the database.

- 3. How does your company intend to provide metro area toll-free calling ("MAC") around Memphis, Nashville, Knoxville and Chattanooga?**

Initially, WorkNet will set up all calling databases to mirror those of BellSouth.

- 4. Is the company aware of the MAC database maintained by BellSouth and the procedures to enter your telephone numbers on the database?**

Yes, WorkNet is aware of the MAC database maintained by BellSouth and the procedures to enter telephone numbers on the database.

- 5. Please provide the name and telephone number of an employee of your company that will be responsible to work with the TRA on resolving customer complaints.**

Linda Rosse will be responsible for working with the TRA to resolve customer complaints regarding WorkNet's services in Tennessee. Ms. Rosse can be reached at (314)595-5701.

- 6. Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA §65-4401 *et seq.* And Chapter 1220-4-11?**

Yes, WorkNet does intend to telemarket services in Tennessee. WorkNet is aware of the telemarketing statutes and regulations found in TCA §65-4401 *et seq.* and Chapter 1220-4-11.

Financial Requirements:

TCA §65-4-125 amendment states that by September 1, 2000, all telecommunications service providers subject to the control and jurisdiction of the authority, except those owners or operators of public telephone service who pay annual inspection and supervision fees pursuant to Tennessee Code Annotated, §65-4-301(b), or any telecommunications service provider that owns and operates equipment facilities in Tennessee with a value of more than five million (\$5,000,000), shall file with the authority a corporate surety bond or irrevocable letter of credit in the amount of twenty thousand dollars (\$20,000) to secure the payment of any monetary sanction imposed in any enforcement proceeding, brought under this title or the Consumer Telemarketing Protection Act of 1990, by or on behalf of the authority.

WorkNet will comply with all financial requirements by the required dates.